



GUIDELINES FOR THE REGULATION AND SITING OF MOBILE PCB DESTRUCTION FACILITIES

A DISCUSSION PAPER

February, 1983

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Ministry of the Environment

The Honourable
Keith C. Norton, Q.C.,
Minister

Gérard J. M. Raymond
Deputy Minister

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INTRODUCTION

Mobile destruction facilities for PCB wastes have been proposed as an alternative to permanently established disposal sites. Such facilities offer an opportunity to destroy the small quantities of PCB wastes which are present in many communities in Ontario and which pose a continuing risk of environmental contamination.

Mobile facilities also offer a potentially acceptable alternative to citizens opposed to the establishment of permanent, large scale waste destruction facilities in their community, while at the same time, reducing the transportation risks in the movement of wastes to permanent facilities. In effect, mobile PCB destruction can deal with PCB wastes on a community by community basis.

The purpose of these guidelines is to outline criteria for the careful management of mobile PCB destruction systems, to provide criteria for the selection of the temporary sites for such facilities and to propose procedures for public participation in site selection. In addition, the guidelines provide for the establishment of operating and performance criteria for the facilities to ensure environmental protection, occupational health and safety and the preservation of community values.

The overall objective is to provide a basis for a regulation under the Environmental Protection Act which will set out the terms and conditions under which mobile PCB destruction facilities may be established. The siting of the facilities will be subject to review by the local community

affected by the siting but it is intended that the regulation will exempt the approval of sites from hearings under the EP Act every time the facilities are moved to a new location.

LEGAL CONSIDERATIONS

Unless otherwise authorized by regulation or by Order in Council, proponents of mobile PCB destruction facilities are subject to the constraints of the the Environmental Protection Act, the Ontario Water Resources Act and amendments thereto.

Under the **Environmental Protection Act**, applications for approval of the establishment of sites or facilities for the disposal or destruction of hazardous wastes are subject to review by a public hearing under Part V of the legislation. Emissions of polluting or deleterious substances to natural watercourses from such sites or facilities are subject to the requirements of the **Ontario Water Resources Act** and as such must be approved by the Director. Emissions into the air from such systems are subject to the requirements of **Regulation 308 of the EP Act**.

While **Regulation 308** does not regulate emissions, it does establish permissible ground level concentrations of specific contaminants. In addition, a standard dispersion calculation is incorporated into the

regulation from which can be derived theoretical ground level concentrations at arbitrarily assigned points of impingement based on known rates of emission, atmospheric conditions, stack heights and stack configuration. It is on the basis of these calculations, or via measurements of actual ground level concentrations, that compliance with Regulation 308 is assessed. Polychlorinated biphenyls (PCBs) are not one of the substances regulated under Regulation 308. However, the accepted practice in dealing with airborne emissions of substances for which there is insufficient data to permit them to be included in the schedule to Regulation 308, is to establish interim guidelines for desirable concentrations in air at a point of impingement which may be used in conjunction with the standard dispersion calculation in the regulation to derive emission requirements. This is the case with PCB in which a point of impingement criterion of 450 ng/m³ (1/2 hour average) and an ambient air criterion of 150 ng/m³ (24 hour average) have been established as interim guidelines.

Regulation 309 of the EP Act defines classes of hazardous and non-hazardous wastes, defines those classes exempted from Part V of the EP Act and prescribes standards for the siting of waste disposal sites, waste incinerators, dumps, organic soils conditioning sites and waste management systems.

Part V of the EP Act prescribes the conditions and procedures for approval of waste management systems and the associated public hearing processes.

Regulation 313 of the EP Act prescribes the conditions and procedures for transfers of liquid industrial waste from the source to waste management systems and disposal sites and requires the submission of properly completed waybills to the Ministry which document these transfers.

Regulation 11/82 of the E.P. Act sets out the terms and conditions under which the Director may authorize the interim storage and transfer of PCB wastes at designated sites in Ontario and requires that operators of such sites maintain a record of such transactions. Such sites are exempted from Sections 27, 39 and 40 of the E.P. Act.

The Environmental Assessment Act is broadly based legislation which requires the proponent of an undertaking to conduct an assessment of the implications of that undertaking on the natural environment, social and economic environment, any building or structure and any combinations thereof. As well, the assessment must include consideration of all available alternatives to the undertaking or alternative methods of achieving the objectives of the undertaking including an analysis of the advantages and disadvantages to the environment (as defined) of all these alternatives. At the present time, the Act has been applied only to activities of the Crown, public bodies or municipalities and to a few specifically designated private enterprises.

In order to authorize the establishment of mobile PCB destruction facilities it is, therefore, necessary to satisfy the constraints of all of

the previously described legislation at each location that the facility is proposed to be established. This means that site specific standards for emissions must be derived from Regulation 308 and the Ontario Water Resources Act. Under present legislation, therefore, the proponent must submit details of how he/she proposes to meet these standards and, after review by the Ministry, the matter is then referred to the Environmental Assessment Board for a public hearing under Part V of the EP Act. The proponent may then be issued a Certificate of Approval and the facility may be established and operated (subject to any conditions that may be attached to the Certificate of Approval). This process would then be repeated each time the facility is moved to a new location.

APPROVAL OF MOBILE DESTRUCTION FACILITIES

The essential objectives in the technical and site-specific appraisal of any proposal having environmental impact are to ensure that the technology under consideration is appropriate and that no unacceptable environmental impairment will result from the application of the technology at a specific site.

For approvals purposes, mobile PCB destruction facilities will be defined as equipment that is established and operated at a site for a period of no longer than 60 days for the disposal of PCB wastes involving the destruction of the PCB component.

Under present legislation, approvals procedures for mobile destruction facilities would have to be repeated every time the facility is moved to a new location. There is, however, precedent for the passage of regulations which provide a regulatory alternative to site-specific approvals for mobile sources of emission. Portable asphalt batching plants used in road construction and general paving are established in the vicinity of a construction site on a temporary basis. They are sources of hydrocarbon and particulate emissions, but, because of their temporary status, the approval of site-specific environmental protection measures every time the plants were moved became cumbersome and repetitive. Consequently, regulations have been promulgated (Regulation 297 of the Environmental Protection Act) which require that portable asphalt plants satisfy specific requirements which ensure an appropriate level of environmental protection at all locations.

Mobile PCB destruction facilities can be treated in a similar way. However, since the technology for mobile PCB destruction is not uniform and because on-site waste management, site selection criteria and occupational health and safety are also important issues to be considered, regulations of such destruction facilities must be approached in a number of stages to address these issues.

Approval of Technology

Two alternative approaches to the approval of mobile PCB destruction technology present themselves:

- 1) The development of a list of approved technologies which have passed rigorous technical examination by an appropriate professional body such as the Ontario Research Foundation, the National Research Council, etc., which would form part of a schedule to a regulation under the Environmental Protection Act.
- 2) The development of specific performance criteria for mobile PCB destruction, which a proponent would be expected to demonstrate are achievable by the technology under consideration. These performance criteria would then be incorporated into a regulation.

From an administrative and regulatory standpoint, the second alternative is preferred. However, in both instances, some level of performance criteria for PCB destruction efficiency and/or PCB emission level will be necessary. In terms of satisfying the requirements for the application of Regulation 308 of the EP Act, an emission level which ensures that the maximum concentration of PCB of 450 ng/m³ (1/2 hour average) is never exceeded at a point of impingement will be necessary as well as ensuring that the 24 hour average ambient air PCB concentration never exceeds the 150 ngm/m³ interim guideline. However, this implies that ground level concentrations of PCB be monitored to assess compliance or that PCB emissions be monitored and PCB concentrations at a point of impingement determined via the appropriate dispersion calculation/mathematical model method.

At the present time it is not possible to determine nanogram per cubic metre (ng/m³) concentrations of PCB in air on a "real time" basis. Currently available instruments cannot detect PCB at these concentrations. Therefore, it is necessary to collect a detectable quantity of PCB from a large volume of air and concentrate the PCB before it can be measured. This usually involves passing a measured volume of air through a specially prepared fluorosil cartridge over a twenty-four hour period. Subsequent extraction and measurement of the PCB from the cartridge in the laboratory is time consuming and, consequently, PCB results are usually obtained about one week after sampling.

In order to address the matter of control of PCB emissions from mobile destruction facilities it is, therefore, necessary to proceed in three stages:

- 1) Design the facility to optimize PCB destruction efficiency and subject the design and technology to rigorous scientific examination and assessment at the laboratory and pilot plant scale.
- 2) Conduct a performance-acceptance test of the full scale commercial application of the technology, paying particular attention to the impact on ambient air quality of both the facility and its waste handling and transfer practices.
- 3) Conduct operational monitoring on a declining scale and frequency to ensure that consistent control of emissions and acceptable air quality can be maintained.

This is the basis of the monitoring requirements appended to these guidelines (Appendix I).

The proponent should, therefore, be required to submit to the Ministry evidence to show that the proposed mobile PCB destruction facility can achieve a PCB destruction acceptable to the Ministry or be capable of ensuring the 24 hour average concentration of PCB in the ambient air outside of the periphery of the site never exceeds 150 ng/m³. Also, using the dispersion calculation contained in Regulation 308 of the Environmental Protection Act, the proponent should be required to show that a half hour average concentration of 450 ng/m³ will not be exceeded at 200 metres or more from the operating facility.

Because of these extremely low level of permissible concentrations of PCB in the air in the vicinity of mobile destruction facilities, fugitive vapour emissions arising from the handling and transfer of PCB wastes may become significant. Control of such emissions can only be achieved by strict measures of control on materials handling and close attention to equipment design to avoid leakage, spillage and vapour losses.

Proponents of mobile PCB destruction should therefore be required to submit to the Ministry a detailed description of how such losses will be controlled.

In addition, it is expected that proponent PCB destruction technologies

will also be judged on their potential as sources of other classes of air emission such as nitrogen oxides, particulate and sulphur oxides in accordance with the provisions of Regulation 308 of the EPA.

Therefore, acceptable concentrations of particulates, nitrogen oxides and other relevant contaminants as specified in Regulation 308 of the EPA should be maintained during operations by dispersion or other appropriate measures. In this regard, careful consideration should be given to existing background levels of contaminants at the site to make sure that the facility does not render the air quality unacceptable.

Emissions of hazardous by-products such as chlorodibenzofurans and chlorodibenzodioxins should also be discussed with the Ministry and appropriate levels of control and emission approved. In addition, the management and disposal of solid residues and liquid wastes that may originate in the facility should be reviewed to ensure that these measures comply with existing PCB waste management guidelines and codes of practice.

Destruction Efficiency

Criteria that have been applied to PCB incineration by the United States Environmental Protection Agency specify a combustion (incineration) efficiency of at least 99.9 per cent for PCB liquids and a PCB destruction efficiency of 99.9999 per cent for PCB solids (a PCB emission no greater than 0.001g per kg PCB introduced into the incinerator).

There is an empirical and stoichiometric relationship between combustion efficiency and PCB destruction in PCB liquid incineration such that 99.9999 per cent PCB destruction is achieved at 99.9 per cent combustion. This is the basis of the U.S. EPA requirement of at least 99.9 per cent combustion efficiency for PCB liquid incineration.

These criteria were developed for the regulation of large-scale PCB waste incinerators. They have been intensively evaluated in the United States with respect to the assurance of safe and efficient PCB destruction.

These criteria would appear to be adequate to satisfy Ontario's point of impingement guideline of 450 ng/m³ (1/2 hour average) and the 24 hour average ambient air quality guideline of 150 ng/m³, particularly for the small scale mobile destruction facilities handling relatively small quantities of wastes that are under consideration here (which would achieve very low rates of PCB emission at these destruction efficiencies).

Accordingly, for the purposes of approval of mobile PCB destruction based on incineration, the U.S. EPA criteria will be adopted. Operators of mobile PCB destruction facilities based on incineration should, therefore, be required to continuously monitor parameters such as CO, CO₂, excess O₂ and temperature to ensure 99.9 per cent combustion efficiency.

Proponents of other classes of PCB destruction process should be required to demonstrate a similar level of destruction efficiency and/or the achievement of a maximum rate of PCB emission necessary to satisfy the Ministry's interim guidelines for PCB in ambient air and at a point of impingement.

SITE SELECTION

Site selection must address the issues of acceptable distance of the facility from sensitive receptors such as residences, hospitals, schools and nursing homes as well as the matter of public participation and community acceptance.

Site Selection Criteria

Candidate sites should be industrial or commercially zoned land. The sites should be separated from residences, schools, hospitals, nursing homes or other sensitive population centres. For the purpose of identifying an acceptable maximum overall PCB emission rate that can be related to the maximum air concentration of PCB of 450 ng/m³ (1/2 hour average) at a point of impingement, a distance of 200 metres from these sensitive receptors is required.

At the same time, it must be possible to restrict public access to the site by temporary enclosures and/or the maintenance of continuous security during the time that the destruction facilities are on-site.

The sites should not be in the immediate vicinity of natural watercourses or drainage systems unless it can be shown that spill prevention and control measures are adequate to protect such watercourses or drainage systems from contamination.

Public Participation

Having identified potential client groups within a particular community or communities, proponents of mobile PCB destruction should proceed towards the selection of sites in the following stages:

- 1) Contact the municipal government through the Chief Administrative Office, Clerk Treasurer or City Engineer to explain what is proposed, to identify the client groups within the community to these officials and to arrange liaison with the municipal political administration.
- 2) Establish municipal input to the selection of candidate sites to ensure that local zoning permits such usage and to initiate the process of local public participation. Ideally the public participation process should proceed as follows:
 - a) Set up a municipal liaison through the municipal government and local community groups.
 - b) Conduct a public information programme through local media, open houses, etc., as a preliminary to obtaining municipal concurrence with the candidate site.
 - c) Establish a citizen working group which will represent the community interest in monitoring the operation of the facility and, where appropriate, the restoration of the site after the facility moves to another location.

Community interests must be addressed by the proponents of mobile PCB destruction to the maximum degree possible as an important matter of goodwill and good business practice. However, the Province of Ontario may authorize the establishment of such temporary destruction facilities in the broader public interest provided that a need for the facilities is clear and they satisfy accepted and approved design, operating and control requirements.

OPERATIONAL CRITERIA

Operational criteria for mobile PCB destruction facilities must address materials handling, occupational health and safety, transportation of wastes, restriction of public access and security, as well as overall emission control and environmental protection.

Materials Handling

The overall objective here is to ensure that PCB wastes are received, transferred and handled at the mobile destruction facility in a safe and expeditious manner which presents no hazard to employees and the local community.

Storage of wastes at the destruction facility should be minimized. As a general rule, a quantity of wastes no greater than 1500 gals or that quantity necessary to sustain the operation for up to 48 hours should be stored on site.

All wastes stored at the facility should be in a specifically assigned feed storage tank. This storage tank should be surrounded by a spill collection tray of sufficient capacity to contain 25% of the tank contents.

Drum storage of wastes at the facility should be minimized but if this becomes necessary, drums should be stored in a metal tray or impounded storage area having sufficient capacity to contain 25% of the drum contents.

Measures should be taken to prevent the collection of PCB contaminated snow or rainfall within impoundments and/or spill trays, such as by the use of temporary plastic covers during precipitation.

Drums received for waste storage should be of good quality, free from corrosion and obvious defects, well sealed and clearly identified as containing PCB. Drums that have been used to bring PCB wastes to the facility should be disposed or re-used in accordance with existing Provincial and Federal PCB waste management guidelines.

Transfers of waste liquids within the facility should be via well engineered equipment and piping fabricated from materials that are compatible with PCB wastes. Drip trays should be placed under all disconnect points, couplings, valves and pumps to collect minor spillage and leakage should it occur.

Provisions should be made to prevent or control PCB vapour emissions during transfers of wastes to the facility. Storage tank vents should be directed back to the tank truck or drum being pumped out or to an appropriate vapour clean-up device such as an activated carbon cartridge. Such cartridges should be changed with sufficient frequency to ensure that no unacceptable PCB emissions pass through them. Spent cartridges should be disposed in accordance with existing Provincial and Federal PCB waste management guidelines.

Proponents should submit to the Ministry a materials flow diagram describing the sequence and the procedures for receipt, handling and transfer of wastes within the facility. The proponent should also submit specifications of the materials of construction of the facility and its waste handling system.

Other precautions in the handling and transfer of PCB wastes should include:

- pump, not pour, PCB waste into containers, (this minimizes splash and spillage);
- inspect equipment used to handle PCB waste frequently and replace if necessary;
- not use pumps and hoses for other purposes (to prevent cross-contamination);

- not use gear-type or other positive displacement pumps; centrifugal pumps recommended for handling hot oil may be used for PCB waste. All wetted surfaces of the pump should be made of stainless steel. The shaft seal should be an external carbon ring type to eliminate exposure of the packing material to the deteriorating effects of PCB. Valves should be brass or stainless steel lined. Hoses should be flexible metal or lined with tetrafluoroethylene or silicone polymers to protect against deterioration;
- PCB waste which has been collected in drip pans under disconnect points, etc., should be transferred to storage drums as soon as possible to reduce contamination risk. Waste should be moved from one location to another ONLY in sealed metal containers which should not be used for any other liquid; other liquids should not be mixed with the PCB waste (except in cases where this constitutes a blending process to produce a consistent and acceptable feed to the destruction process). If a spill occurs, it should be cleaned up immediately as described under Contingency Plans.

Transportation

Sources of wastes to be handled at the destruction facility should be limited to the local community in which the facility is sited. However, recognizing that mobile destruction facilities may need to serve more than one local jurisdiction, the movement of wastes across municipal boundaries may be authorized despite the desire to service PCB waste

disposal requirements on a community by community basis. In this context, a collection area within a specific radius of the temporary site of the facility, which is acceptable to the municipalities involved, may be an appropriate alternative in such cases.

Transportation of wastes to the site should be via approved waste haulage contractors specifically authorized to handle hazardous wastes who have the appropriate equipment and trained personnel. Transfers and receipts should be documented under the Ministry of the Environment waybill system. Transportation routes to the facility and the time periods when wastes may be transported should be negotiated with the Municipality where appropriate.

Occupational Health and Safety

In general, appropriate standards of safety and hygiene should be employed to avoid direct skin contact with PCB wastes since this is the most likely route of excessive occupational exposure.

Proponents of mobile PCB destruction should review all occupational health and safety measures with Ontario Ministry of Labour, both in the predevelopment stage and the operational phase. Matters such as PCB exposure guidelines, protective equipment and clothing, engineering controls, hygiene practices, monitoring of exposure and medical surveillance of workers should be reviewed with the Industrial Health and Safety Branch of the Ministry in the context of application of the Occupational Health and Safety Act.

Contingency Plans

A clearly identified and understood procedure should be available to deal with on-site emergencies such as spills, excessive PCB emissions to the air, fires and vandalism. Reference should be made to the Province of Ontario Contingency Plan for Spills of Oil and Hazardous Materials.

Never-to-exceed control parameters, such as temperature and excess oxygen minima, should be established for the destruction facility so that excursions outside of these parameters are grounds for immediate shut-down.

Clean up procedures should be established to deal with spills or accidents so that losses are contained and risk of exposure of workers and the general public is minimized.

The general steps that should be incorporated into a contingency plan include:

1. Notify The Ministry of the Environment and Municipal authorities providing them with an estimate of the magnitude of the spill or emission and the extent to which PCB has escaped the site area.
2. Institute appropriate personnel protection measures.
3. Begin immediate measures to recover as much of the spilled PCB liquid as possible.

4. Recover the remainder with sorbent materials.
5. Transfer sorbent materials, contaminated soils and residues to drums or other appropriate containers as quickly as possible.
6. Isolate natural drainage and surface run off from the spill site by temporary diversion ditches and by covering the spill area with plastic sheet.

Appropriate sorbent materials for PCB spills include:

- sawdust
- vermiculite
- Imbiber Beads (by Dow Chemical, Sarnia)
- Hy-Dry (by Tennier Chemicals, Hamilton)
- Diasorb (by Diamond Shamrock, Cleveland, Ohio)
- Stay-Dry (by Waverly Mineral Products, Philadelphia)
- Oil-Dry (by Waverly Mineral Products, Philadelphia)
- Oil-Sorb (Seneca Paper Products, Oakville, Ontario)
- activated charcoal
- soil with a high humus content

Security

Provisions should be made by the proponent for the restriction of public access to the facility to reduce the risks of accidental exposure to PCB and to prevent unauthorized entry and vandalism. Temporary fencing around the site, flood lights and 24 hour security should be considered as appropriate security measures.

SITE RESTORATION

Site restoration should be instituted as soon as possible after the mobile destruction facility has left the site. It should be directed towards restoring the site to its former use and appearance with some consideration given to site improvement by appropriate landscaping, grading or filling.

APPENDIX 1
MONITORING REQUIREMENTS AT MOBILE
PCB DESTRUCTION FACILITIES

Objectives

1. To provide assurance that air quality in the vicinity of mobile PCB destruction facilities is not impaired by excessive PCB emissions.
2. To confirm that emission controls and operating efficiency are being maintained at mobile destruction facilities such that the overall rate of PCB emission does not exceed 700 ug/second (the maximum permissible level of emission necessary to ensure that the 1/2 hour average level of PCB at a point of impingement 200 metres or more from the facility does not exceed 450 ng/m³.)

It is not the purpose of these monitoring requirements to provide the basis for the demonstration of the effectiveness of proponent technologies, in terms of PCB destruction efficiency which would be subject to a much more rigorous scientific examination.

General Principles

It is expected that proponents of mobile PCB destruction will have demonstrated through laboratory, pilot-scale and full scale studies that their equipment is capable of achieving an acceptable level of efficiency in PCB destruction with no emission of harmful levels of hazardous by-products.

The purpose of these monitoring requirements is the field assessment of the application of mobile PCB destruction on a commercial scale, with a view to impact on ambient air quality of both the technology and the handling of PCB wastes at the site.

Notwithstanding this, there will be an initial performance-acceptance test of the commercial application of all proponent technologies. The acceptance test will be based on a short term intensive ambient air monitoring programme around a commercial-scale operation of the technology.

Subsequent operational monitoring at the facility will involve less intensive ambient air monitoring. If satisfactory results are obtained from the acceptance and operational monitoring, then the frequency and intensity of monitoring will be reduced at subsequent applications of the technology and eventually eliminated (except for random spot checks).

All monitoring will be conducted by the Ministry in accordance with its published procedures and protocols.

Performance Acceptance Monitoring

Eight monitoring stations will be established at points around the facility no less than 200 metres from the facility, taking into consideration sensitive receptors such as residences, hospitals, schools, etc.

These eight stations will continuously sample air on a 24 hour per day basis for at least 7 days during a full-scale operating period of the mobile PCB destruction facility. The samplers will be operated in conjunction with measurements of wind (by a recording anemometer) and measurements of air stability conditions (net radiometer).

Operational Monitoring

Initial operational monitoring, after the acceptance test, will involve four stations at cardinal points around the facility (or opposite sensitive receptors) no less than 200 metres from the facility.

These monitors will sample air 24 hours per day on a daily basis for a two week period during commercial operation of the facility. If during this period, no unacceptable levels of PCB in the ambient air in the vicinity of the facility are identified, then sampling frequency will be reduced to 3 days per week for a further two week period. If these samples show no unacceptable PCB in the air in the vicinity of the facility, no further ambient air monitoring will be required.

Subsequent Monitoring

It is expected that operators of mobile PCB destruction facilities who have successfully passed performance-acceptance testing and operational monitoring requirements will not require further ambient air monitoring at subsequent locations of their facility. It is anticipated that

operational control parameters and materials handling practices will be sufficiently developed during the acceptance testing and operational monitoring to provide reasonable indirect assurance of no unacceptable emissions of PCB from the facility.

The Ministry will continue to inspect the facilities to make sure that proper operations are being maintained and will conduct random spot checks of air quality around the facility.

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